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May 30, 2008

Via Electronic Mail

Lynn Fabrizio, Esq.
Staff Attorney
NH Public Utilities Commission
21 Fruit Street, Suite 10
Concord, NH 03301

***Re: DT 07-11, Comcast Comments on The Liberty Consulting Group Draft
Assessment of FairPoint Cutover Readiness Verification Plan.***

Dear Ms. Fabrizio:

Thank you for providing Comcast the opportunity to review the Liberty Assessment document circulated on May 22, 2008.

Comcast has been participating in the working sessions and wholesale meetings with FairPoint, and in general, has found them to be responsive to our concerns. We are also appreciative of the comprehensive participation of Liberty Consulting. In reviewing the Liberty Assessment of FairPoint's Cutover Readiness, however, one aspect of the testing review is critical and we do not believe is reflected in the document.

Based on feedback from FairPoint, it our understanding that up to 50% of the wholesale LSR testing has failed, and this is due to EDI inconsistencies between Verizon's business rules and Wisor business rules - causing validation errors. It appears that FairPoint's systems are not being built to represent all of Verizon's business rules. Liberty should ensure that FairPoint is not changing the Verizon business rules (for the States of Maine, New Hampshire and Vermont), which they are required to follow as a result of the dockets. In addition, FairPoint should certify their customers with the latest Verizon East Release (9.10.0) which contains FCC mandates (Docket No. 07-243, 07-244, 04-36) that stipulates reduced validation criteria for Local Number Portability orders.

Please let me know if you have any questions. I can be reached directly at 978-927-5700 ext 4337.

Sincerely,

Stacey L. Parker
Sr. Director, Regulatory Affairs

cc: Alan Mandl, Smith & Duggan
Brian Rankin, Comcast